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Food Safety and Inspection Service
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AUDIT REPORT FOR MEXICO
April 16 through May 8, 2002

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Mexico's meat inspection system from April 16 through May 8, 2002. Twelve of the 30 establishments certified to export meat to the United States were audited. Six of these were slaughter establishments; the other six were conducting processing operations.

The last audit of the Mexican meat inspection system was conducted in November 2001. Eleven establishments (TIF 66, 74, 104, 105, 111, 120, 159, 169, 188, 209, and 271) were audited on-site. The auditor found several deficiencies in establishment TIF 188, which was evaluated during the Nov. 2001 audit as "Acceptable/Re-review." TIF 105 and TIF 111 were delisted due to non-government personnel conducting post-mortem inspection duties. A record review of TIF 152 revealed the same serious deficiency regarding non-government employees conducting postmortem inspection, and this establishment was delisted. These four establishments were selected to be audited on-site for this audit.

Four major concerns resulted from the 2001 audit:

- Inspectors who paid by the establishments, and not by SAGARPA were performing post-mortem inspection and making final dispositions on carcasses in two of the five slaughter establishments audited on-site and also in one establishment selected for document review.

- Required documentation of SSOPs was not done daily in 12 of the 19 establishments whose programs were examined.

- Pre-shipment document reviews had not been implemented in 10 of the 18 establishments in which HACCP programs were required.

- Corrective actions to be taken in the event that critical limits were exceeded had not been written into the HACCP plans in seven of the 18 establishments that had HACCP plans.

Raw and cooked beef products, pork, edible organs, and fully cooked chicken and turkey were eligible for export to the U.S. at the time of this audit.

From January 1 to December 31, 2001, Mexican establishments exported 16,024,029 pounds of beef, pork, edible organs and processed chicken and turkey to the U.S. Of this amount, 6,178,824 pounds were reinspected at U.S. ports of entry (POE); rejections were for contamination (0.06% of the amount reinspected) and violative net weight (0.02%). From January 1 to February 28, 2002, Mexican establishments exported 2,933,473 pounds of beef, pork, edible organs and processed chicken and turkey to the U.S. Of this amount, 687,198 pounds were reinspected at U.S. ports of entry (POE); rejections were for missing shipping marks (0.02% of the amount reinspected).

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Mexican national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. The third part was conducted by on-site visits to establishments. Eight of the establishments selected for on-site audits were chosen at random; three establishment (TIFs 105, 111, and 152) were added because they had been found unacceptable during the previous audit, and one establishment (Est. 188) had been evaluated as re-review during the previous audit. The fourth part involved visits to two laboratories, one a private laboratory conducting microbiological analyses for a fee, and the other a university laboratory conducting analyses for the government field-testing program for *Salmonella* species.

Mexico's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the operation of sanitation standard operating procedures (SSOPs), (2) Animal Disease Controls, (3) Residue Controls, (4) Slaughter/Processing Controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the testing program for generic *E. coli*, and (5) Enforcement Controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the FSIS auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect, and eliminate product contamination/ adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials. Three establishments fell into this category.

RESULTS AND DISCUSSION

Summary

Effective inspection controls were found to be in place in 10 of the 12 establishments. Four of these were served with 30-dayletters: Est. TIF 105 due to sanitary dressing deficiencies, TIF 152 for establishment sanitation deficiencies, and TIF 45 and 169 because of incomplete HACCP plans. Est. TIF 45 also lacked an *E. coli* testing plan. Details of the audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* species and generic *E. coli*, are discussed later in this report.

As stated above, four major concerns had been identified during the last audit of the Mexico meat inspection system, conducted in November 2001:

- *Establishment-paid inspectors were performing post-mortem inspection and making final dispositions in three establishments.* This had been corrected.

- *Required documentation of SSOPs was not done daily in 12 (63%) of the 19 establishments whose programs were examined.* During this new audit, required SSOP documentation was deficient in five (31%) of the 16 establishments evaluated.

- *Pre-shipment document reviews had not been implemented in 10 of the 18 establishments in which HACCP programs were required.* This had been satisfactorily addressed and corrected.

- *Corrective actions to be taken in the event that critical limits were exceeded had not been written into the HACCP plans in seven (39%) of the 18 establishments that had HACCP plans.* This deficiency was again identified in four (25%) of the 16 establishments evaluated; this was a repeat finding.

In addition, the following new concern resulted from this new audit:

- Employees in three (25%) of the establishments visited on-site (TIF 45, 111, and 152) were observed handling cartons and then liners and raw, exposed product without sanitizing their hands.

Entrance Meeting

On April 16, 2002, an entrance meeting was held in the Mexico City offices of the Mexican Export Meat Inspection Services (SAGARPA) and was attended by Mr. José Angel Del Valle, Mexican Animal Health General Director; Dr. Alejandro Jimenez, Head, TIF Plants Department; Dr. Gabriella Bermudez, Supervisor of TIF plants;

Dr. Gildardo Galvez, Supervisor of TIF plants; and Mr. Sal Trejo, Agricultural Specialist, FAS, USDA, U.S. Embassy in Mexico City, and Dr. Judd Giezentanner, International Audit Staff Officer, FSIS. Topics of discussion included the following:

1. Audit procedures,
2. The current status of the animal health situation in Mexico,
3. Previous deficiencies, and
4. The details of the itinerary for the new audit.

Headquarters Audit

There was a new Animal Health General Director, Mr. José Angel del Valle. A new position, Director of Imports, Exports and Services to Industry & Livestock Certification, had been created, and had been filled by Ms. Mara Gonzales.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials that normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The Auditor conducted a review of inspection system documents in the central SAGARPA offices in Mexico City and in the respective District offices. This records review focused primarily on food safety hazards and included the following:

- Changes in departmental structure and staffing,
- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records from Washington, D. C.
- Sampling and laboratory analyses for residues.
- Export product inspection and control, including export certificates.
- Enforcement records including examples of withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

No concerns arose as a result of the examination of these documents.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Mexico as eligible to export meat/poultry products to the United States were full-time SAGARPA employees, receiving no remuneration from either industry nor establishment personnel.

Establishment Audits

Thirty establishments were certified to export meat and/or poultry products to the United States at the time this audit was conducted. Twelve establishments were visited for on-site audits. In all of the 12 establishments visited, both SAGARPA inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products, except as otherwise noted in this report.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories, intra-laboratory quality assurance procedures, including sample handling, and methodology.

The University of Baja California Microbiological Laboratory was audited on April 29, 2002. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation, and corrective actions. The methods used for the analyses were acceptable. *Salmonella* testing for the government program and *E. coli* testing on a fee basis were being conducted

Mexico's microbiological testing for *E. coli* was being performed in private laboratories on a fee basis. One of these, the laboratory of Establishment TIF 100, Sigma Alimentos, Noreste, SS. De C.V. in Monterrey, was audited. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories have been accredited/approved by the government, accredited by a third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the 12 establishments visited on-site:

Beef boning – one establishment: TIF 188
Beef processing – one establishment: TIF 114

Swine slaughter – two establishments: TIF 66 and 152
Pork and poultry processing – one establishment: TIF 169
Beef slaughter – three establishments: TIF 105, 111, and 120
Beef slaughter; beef and poultry processing – one establishment: TIF 45
Beef and poultry processing – three establishments: TIF 86, 150, and 158

SANITATION CONTROLS

Based on the on-site audits of establishments, Mexico's inspection system had controls in place for: chlorination procedures, water potability records, back siphonage prevention, sanitizers, separation of establishments, pest control monitoring, temperature control, operations work space, inspector work space, ventilation, facilities approval, ante-mortem facilities, outside facilities, product transportation and pre-operational sanitation.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with these exceptions:

- Preventive measures were not documented in establishments TIF 45, 90, 105, 111, and 152.

- The dropped-meat reconditioning procedure was not part of the written SSOP in Est. TIF 105.

In addition, the following sanitation deficiencies were found:

Product Handling and Storage

- Condensation on overhead structures above exposed product was a problem in Est. TIF 45. Company personnel put corrective actions in place immediately.

- Employees in Ests. TIF 45, 111 and 152 were observed handling cartons and then liners and raw, exposed product without sanitizing their hands. Corrective actions were taken immediately.

Product Contact Equipment

- In Est. 152, mid-shift cleanup of the splitting saws was not performed adequately as required in the written SSOP. A 30-day letter was issued as a result and the establishment took corrective actions.

Basic Facilities

- The facilities for dropped-meat reconditioning were inadequate in Est. TIF 105: there was no convenient water supply for hand washing or cleaning of the product-contact surface after reconditioning of the dropped meat.

ANIMAL DISEASE CONTROLS

Mexico's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product. All personnel performing ante- and post-mortem inspection and dispositions were full-time employees of SAGARPA and received no remuneration from the establishments.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Mexico's National Residue testing Plan for 2002 was being followed, and was on schedule. The Mexican inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the Mexican inspection system had controls in place to ensure adequate ante- and post-mortem inspection procedures and dispositions, control and dispositions of dead, dying, diseased or disabled animals, humane handling, and slaughter and dressing procedures.

- In Est. TIF 105, milk spillage was observed on a carcass on the slaughter line. The zero-tolerance policy for contamination with milk was not enforced: the milk was not trimmed immediately, until the auditor pointed out the need.

HACCP Implementation

All establishments approved to export meat/poultry products to the U.S. are required to have developed and implemented Hazard Analysis – Critical Point (HACCP) systems. Each of these systems was evaluated according to the criteria employed in the U. S. domestic inspection program. The data collection instrument used accompanies this report. (Attachment B)

The HACCP programs were found to meet the basic FSIS regulatory requirements with the following exceptions:

- In Ests. TIF 45, 120, 152, and 188, preventive measures were not adequately addressed in the HACCP plans, and documentation was inadequate.

- The hazard analysis had not taken into consideration all the steps in the process in Ests. TIF 120 and 169.

- Corrective actions were not adequately addressed in the documentation in Est. TIF 111.

- The HACCP plan in Est. TIF 169 had not been validated with multiple monitoring results.

Testing for Generic *E. coli*

Mexico has adopted the FSIS regulatory requirements for generic *E. coli* testing.

Six of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

Additionally, establishments had adequate controls in place to prevent meat/poultry products intended for Mexico domestic consumption from being commingled with products eligible for export to the U.S.

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements, with the following exception:

- In Est. TIF 0045, there was no written *E. coli* testing program. The proper protocol for the program was being generally followed, but there were no written directions, and the technician administering the program utilized poor technique. A 30-day letter requiring correction was issued to the establishment.

ENFORCEMENT CONTROLS

Inspection System Controls

The Mexican inspection system controls were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. These included: control of restricted product and inspection samples; boneless meat re-inspection; shipment security, including shipment between establishments; prevention of commingling of product intended for export to the United States with domestic product; monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans); inspection supervision and documentation; the importation of only eligible livestock or poultry from other countries (i.e.; only from eligible countries and certified establishments within those countries); and the importation of only eligible meat or poultry products from other countries for further processing. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

The six slaughter establishments and two others producing ground meat (TIF 114 and 188) were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Mexico has adopted the FSIS regulatory requirements for *Salmonella* testing with the exception of the following equivalent measures:

The inspection personnel collected samples for *Salmonella* testing, including all establishments not required to meet FSIS testing requirements. Testing for *Salmonella* was performed both in a government laboratory (CENAPA) and also in certified private laboratories. SAGARPA officials use the FSIS method for *Salmonella* analysis.

Mexico has adopted the FSIS regulatory requirements for HACCP. *Salmonella* testing is same, with the exception of the following equivalent measures:

Private laboratories analyze samples.

- The approval/accreditation process for private laboratories is done in accordance with Mexico's Federal Animal Health Law, the Federal law of Metrology and Standardization, the Criteria for the Operation of Animal Health Testing Laboratories, and the Characteristics and Specifications for Facilities and Equipment for Animal

Health Testing and/or Analyzing Laboratories. The approval/accreditation process and on-going verification are conducted by Mexico (SAGARPA).

- Private laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping facilities.

- Test results are sent from private laboratories directly to the General Directorate of Animal Health of the Government of Mexico.

Species Verification

At the time of this audit, Mexico was not exempt from the species verification requirement. The auditor verified that species verification was being conducted in accordance with FSIS requirements.

Monthly Reviews

FSIS requires documented supervisory visits by a representative of the foreign inspection system to each establishment certified as eligible to export to the United States, no less frequently than one such visit per month, during any period when the establishment is engaged in producing products that could be used for exportation to the United States.

These reviews were being performed by the Mexican equivalent of FSIS area Supervisors. All were veterinarians. Dr. Alejandro Jiménez was in charge of the federally inspected establishments. The internal reviewers reported their findings to him and he then decided what action should be taken. Routine findings were sent by mail but in the case of noncompliance, results were conveyed by telephone.

The internal review program was applied equally to both export and non-export establishments. Annually scheduled reviews were announced in advance and were conducted at times by individuals and at other times by a team of reviewers. Reviews organized by State Supervisors were randomly announced. They were conducted at least once monthly in establishments producing and exporting product to the U.S. The records of audited establishments were kept in the inspection offices of SAGARPA in Mexico City, in State offices, and in the establishments, and were routinely maintained on file for a minimum of one year.
In the event that an establishment is found, during on of these internal reviews, to be out of compliance with U.S. requirements, the supervising inspector performing the review would immediately inform SAGARPA headquarters. SAGARPA would then initiate a prompt review of that particular establishment. If, during this audit, deficiencies are found to persist, the establishment is removed from the list of establishments certified as eligible to export to the U.S. Monthly reviews were found to be complete in all establishments visited.

Enforcement Activities

The "Federal Animal Health Act" gave SAGARPA enforcement responsibilities and duties. One portion of this document deals with "complaints" and the other with "administrative sanctions". In the case of complaints, the Secretary of Agriculture can order the investigation of the complaint, which must be accomplished within 15 days. Administrative sanctions are imposed in the form of letters and fines. Fines can range from 500 to 100,000 Mexican pesos (Approximately U.S $55 to $11,000). Other sanctions, in cases of repeat violators, include double fines, then temporary and final suspension. After one violation the offender is suspended from producing product in the meat industry. After the second violation, the violator is not allowed to work in the meat industry.

There were no investigations or prosecutions during the previous year.

Exit Meetings

An exit meeting was conducted in Mexico City on May 8, 2002. The participants were Dr. Alejandro Jimenez, Head TIF Plants Department; Dr. Gabriella Bermudez, Supervisor of TIF Plants; Dr. Gildardo Galvez, Supervisor of TIF Plants; Dr. Concepcion Silva, Supervisor of TIF Plants; Mr. Sal Trejo, Agricultural Specialist, USDA, FAS, U.S. Embassy; and Dr. Judd Giezentanner, International Audit Staff Officer, FSIS. The following topics were discussed:

1. The deficiencies that prompted the issuance of 30-day letters to Ests. TIF 45, 105, 152, and 169. The Mexican officials gave assurances that the field inspection personnel would ensure that corrective actions are effective. The auditor informed the SAGARPA officials that these establishments would be audited again during the next audit trip by FSIS.

2. The various deficiencies found in the HACCP plans. The Mexican officials gave assurances that the field inspection personnel would ensure that corrective actions are effective. The auditor informed the SAGARPA officials that these establishments would be audited again during the next audit trip by FSIS.

CONCLUSION

The inspection system of Mexico was found to have, except as otherwise noted in this report, effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Twelve establishments were audited. Deficiencies identified during the audits resulted in the issuance of 30-day letters to three establishments audited on-site and another selected for document audit.

Dr. Judd Giezentanner (signed)*Dr. Judd Giezentanner*
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing
D. Data collection instrument for *Salmonella* testing
E. Laboratory Audit Form
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report *(no comments received)*

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
45	√	√	√	√	√	√	Inadeq.	√
66	√	√	√	√	√	√	√	√
86	√	√	√	√	√	√	√	√
105	√	√*	√	√	√	√	Inadeq.	√
111	√	√	√	√	√	√	Inadeq.	√
114	√	√	√	√	√	√	√	√
120	√	√	√	√	√	√	√	√
150	√	√	√	√	√	√	√	√
152	√	√	√	√	√	√	Inadeq.	√
158	√	√	√	√	√	√	√	√
169	√	√	√	√	√	√	√	√
188	√	√	√	√	√	√	√	√

105 The dropped-meat reconditioning procedure was not addressed in the written plan.
45, 105, 111, 152 Preventive measures were not documented.

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

90	√	√	√	√	√	√	Inadeq.	√
92	√	√	√	√	√	√	√	√
95	√	√	√	√	√	√	√	√
104	√	√	√	√	√	√	√	√

90 Preventive measures were not documented.
TIF 45, 105, 152 were issued 30-day letters.

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10.Adequate documentation	11. Dated and signed	12.Pre-shipmt. doc. review
45	√	√	√	√	√	√	Inad	√	√	√	√	√
66	√	√	√	√	√	√	√	√	√	√	√	√
86	√	√	√	√	√	√	√	√	√	√	√	√
105	√	√	√	√	√	√	√	√	√	NO*	√	√
111	√	√	√	√	√	√	√	√	√	NO	√	√
114	√	√	√	√	√	√	√	√	√	√	√	√
120	√	Inad	√	√	√	√	Inad	√	√	√	√	√
150	√	√	√	√	√	√	√	√	√	√	√	√
152	√	√	√	√	√	√	Inad	√	√	√	√	√
158	√	√	√	√	√	√	√	√	√	√	√	√
169	√	Inad	√	√	√	√	√	√	√	√	√	√
188	√	√	√	√	√	√	Inad	√	√	√	√	√

105 The zero-tolerance policy for contamination with milk was not enforced.
120, 169 The hazard analysis did not include all the steps in the process.
45, 120, 152, 188 Preventive measures were not addressed in the written HACCP plan.
Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

90	√	√	√	√	√	√	√	√	√	√	√	√
92	√	√	√	√	√	√	√	√	√	√	√	√
95	√	√	√	√	√	√	√	√	√	√	√	√
104	√	√	√	√	√	√	√	√	√	√	√	√

TIF 45, 105, 152 & 169 were issued 30-day letters.

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
45	NO	√	√	√	√	√	√	√	√	√
66	√	√	√	√	√	√	√	√	√	√
86	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
105	√	√	√	√	√	√	√	√	√	√
111	√	√	√	√	√	√	√	√	√	√
114	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
120	√	√	√	√	√	√	√	√	√	√
150	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
152	√	√	√	√	√	√	√	√	√	√
158	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
169	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
188	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

90	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
92	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
95	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
104	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

TIF 45 was issued a 30-day letter.

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	1.Testing as required	2. Carcasses are sampled	3.Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
45	√	√	N/A	√	√	N/A
66	√	√	N/A	√	√	N/A
86	N/A	N/A	N/A	N/A	N/A	N/A
105	√	√	N/A	√	√	N/A
111	√	√	N/A	√	√	N/A
114	√	N/A	√	√	√	N/A
120	√	√	N/A	√	√	N/A
150	N/A	N/A	N/A	N/A	N/A	N/A
152	√	√	N/A	√	√	N/A
158	√	√	N/A	√	√	√
169	N/A	N/A	N/A	N/A	N/A	N/A
188	√	N/A	√	√	√	N/A

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

90	N/A	N/A	N/A	N/A	N/A	N/A
92	N/A	N/A	√	√	√	N/A
95	N/A	N/A	N/A	N/A	N/A	N/A
104	N/A	N/A	N/A	N/A	N/A	N/A